REMARKS

Reconsideration of all grounds of rejection, and allowance of the entire application is respectfully requested with regard to the above amendments and the following remarks. Claims 1-26, as shown above, remain pending herein.

Applicants first note with appreciation and thank the Examiner for the indication in the previous Office Action that claims 9-12, 17-21, and 23-26 are allowed, and that claim 22 is allowable.

Summary of the Rejections:

1) Claims 1-8 stand rejected under 35 U.S.C§102(b) as allegedly being anticipated by Nagarajan et al. (U.S. 5,884,174 hereafter "Nagarajan").

(2) Claims 13-16 stand rejected under 35 U.S.C. §103(a) over Nagarajan in view of the article entitled GSM Network Optimization, May 2000.

(3) Claim 22 (which is allowable) stands rejected under 35 U.S.C. §112, second paragraph for a minor informality.

Applicant's Traversal:

Applicants respectfully submit that none of the instant claims are anticipated by Nagarajan, nor are any of the claims obvious over the combination of Nagarajan and GSM Network Optimization, May 2000.

Applicants respectfully submit that Nagarajan uses what it refers to as a "fractional guard" channel method (column 4, lines 35-46) that effectively reserves a non-integral number of guard channels for handoff calls by rejecting new calls with some degree of probability that depends on current channel occupancy. Whenever the channel occupancy exceeds a first threshold, the fractional guard

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channel method admits some new calls with a certain probability determined with reference to the current channel occupancy.

Figs. 3A-3C of Nagarajan are a flowchart for the method that minimizes the probability of blocking new calls in situations <u>where a fixed constraint is placed on the probability of blocking handoff calls</u> (please see Nagarajan, column 6, lines 15-26).

Figs. 4A-4B of Nagarajan are a flowchart for a method of controlling call admission where it is desired to minimize the number of required channels, while at the same time, <u>place fixed constraints on the blocking probabilities of new and handoff calls</u>.

Thus, with regard to claims 1-8, Applicants respectfully submit that the present invention patentably distinguishes over Nagarajan because the reference does not disclose that there is a monitoring of a quantity of handoffs drops versus successful handoff calls for an initial L_p term, an adjusting the admission threshold according to the result of the initial L_p term monitored in step (a), and then a repeating of the steps until the target handoff dropping probability is satisfied. The reference is also completely silent with regard to disclosing that the successive L_p term is longer than or equal to the initial L_p term and includes the initial L_p term.

In other words, Nagarajan, by placing fixed constraints on the handoff call blocking probability (column of Nagarajan 4, lines 39-46) and by minimizing the number of channels when placing fixed constraints on both the new call blocking probability and the handoff call blocking probability, functions almost in an opposite fashion to the instantly claimed invention, as there is little or no regard for handoff drops, as handoff call blocking leads to dropped handoff calls. Further, Nagarajan discloses at column 6, lines 15-27, that the method (shown in flowcharts 3A-3C) minimizes the probability of blocking new calls where a fixed constraint is placed on the probability of blocking handoff calls.

In contrast, the presently claimed invention considers the handoff drop ratio as the basis for

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adjusting other parameters of the method, even if that comes at the expense of blocking new calls. Accordingly, Applicants respectfully submit that none of the instant claims are anticipated by Nagarajan as this reference fails to disclose all of the recited claim elements in base claim 1. In addition, it is respectfully submitted that none of the instant claims would have been obvious to an artisan in view of Nagarajan.

In view of rejections under 35 U.S.C.§102(b), the MPEP refers to the case of *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628,631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987), wherein the Court of appeals for the Federal Circuit held that:

> A claim is anticipated only if each and every element as set forth in
>
> the claim is found, either expressly or inherently described, in a single
>
> prior art reference.

Accordingly, reconsideration and withdrawal of all grounds of rejection of claims 1-8 are respectfully requested.

With regard to the rejections of claims 13-16 over the combination of Nagarajan and GSM Network Optimization, May 2000 under 35 U.S.C.§103(a), Applicants respectfully submit that these claims are believed to be allowable at least for similar reasons discussed above regarding instant claim 1. The addition of GSM Network Optimization, May 2000 to Nagarajan still fails to disclose or suggest all the elements recited by claims 13-16. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Finally, Applicants have amended claims 9 and 22 to remove minor informalities, and both claims are now ready for allowance.

For all the foregoing reasons, Applicants respectfully submit that all grounds of rejection have been overcome. A Notice of Allowance is respectfully requested.

Should the Examiner deem that there are any issues which may be best resolved by telephone, please contact Applicant's undersigned representative at the number listed below. If there are any fees due and owing, please charge Deposit Account No. 502-470.

Respectfully submitted,

Steven Cha
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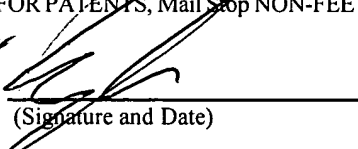Registration No. 44,069

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